

BURSOR & FISHER, P.A.

L. Timothy Fisher (State Bar No. 191626)
Yeremey O. Krivoshey (State Bar No. 295032)
Blair E. Reed (State Bar No. 316791)
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
E-Mail: ltfisher@bursor.com
ykrivoshey@bursor.com
breed@bursor.com

BURSOR & FISHER, P.A.

Scott A. Bursor (State Bar No. 276006)
888 Seventh Avenue
New York, NY 10019
Telephone: (212) 989-9113
Facsimile: (212) 989-9163
E-Mail: scott@bursor.com

Attorneys for Plaintiff

ELLIS LAW GROUP LLP

Mark E. Ellis - 127159
Anthony P. J. Valenti - 284542
Lawrence K. Iglesias - 303700
1425 River Park Drive, Suite 400
Sacramento, CA 95815
Tel: (916) 283-8820
Fax: (916) 283-8821
mellis@ellislawgrp.com
avalenti@ellislawgrp.com
liglesias@ellislawgrp.com

Attorneys for Defendant
RASH CURTIS & ASSOCIATES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SANDRA MCMILLION, JESSICA
ADEKOYA, and IGNACIO PEREZ, on
Behalf of Themselves and all Others Similarly
Situating,

Plaintiffs,

v.

RASH CURTIS & ASSOCIATES,

Defendant.

Case No. 4:16-cv-03396-YGR

**THE PARTIES' PROPOSED JURY
QUESTIONNAIRES**

Date: April 12, 2019
Time: 9:00 a.m.
Courtroom 1, 4th Floor

Hon. Yvonne Gonzalez Rogers

JUROR QUESTIONNAIRE

Please PRINT your answers

To Be Completed by Jurors called to the Courtroom of the Hon. Yvonne Gonzalez Rogers for the Trial of:
Sandra McMillion et al. v. Rash Curtis & Associates Case Number: **4:16-cv-03396-YGR**

Name: _____ Age: _____ Birthplace: _____

Residence: _____ Years: _____ Prior Residence: _____ Years: _____

Education: Highest Grade Completed: _____ Degrees: _____

College/Vocational Schools attended: _____ Areas of Study: _____

Current Occupation/Position: _____ Length of Service: _____

Employer: _____

Describe Any Supervisory Roles: _____

Prior Occupation/Position: _____ Length of Service: _____

Employer: _____

Describe Any Supervisory Roles: _____

Current Status (Circle): Single (living alone/with others) Married Separated Divorced Widowed

Occupation & Employer of Adults Living in the Same Household: _____

Children: Age(s) _____ Occupation(s) if employed: _____

Is English your first language? YES ☐ NO ☐ IF NO, do you use it regularly at work or home? YES ☐ NO ☐

Do You OR any CLOSE Family/Friends have military Service or Law Enforcement Training? YES ☐ NO ☐

Have You Ever Served on a Jury? Circle: YES NO Number of times: _____ Date(s) of Service: _____

Circle: State Court Federal Court Both Circle: Civil Case Criminal Case Both

Did each jury reach a verdict? YES ☐ NO ☐ Have you ever served as Foreperson? YES ☐ NO ☐

[CONTINUED ON NEXT PAGE]

Have You Or Any Family Members Or Friends Ever Worked In Collections? YES ☐ NO ☐

If yes, provide basic details: _____

Have You Or Any Family Members Or Friends Had Any Experience With Debt Collectors? YES ☐ NO ☐

If yes, provide basic details: _____

Have You Ever Been Convicted of a Felony? YES ☐ NO ☐

If yes, provide basic details: _____

Have You Ever Testified in any Court Proceeding? YES ☐ NO ☐

If yes, describe: _____

Circle If You Have STRONG opinions on any of the following institutions/topics:

Class Action Lawsuits

The following is a list of potential witnesses and persons affiliated with the case. CIRCLE any names of those who you know or with whom you are personally familiar:

Individuals	Individuals Cont'd.
Adekoya, Jessica	Patterson, Lex
Bird, Darrin	Perez, Ignacio
Bursor, Scott	Reed, Blair E.
Caldwell, Geraldine	Reynoso, Daniel
Correa, Dan	Snyder, Randall A.
Ellis, Mark E.	Sonognini, Shane
Fisher, L. Timothy	Steinheimer, Andrew M.
Griffith, Amanda N.	Valenti, Anthony P.J.
Iglesias, Lawrence K.	Verkhovskaya, Anya
Keith, Bob	Weir, Colin B.
Keith, Nick	Entities
Kizer, Steve	Rash Curtis & Associates
Krivoshey, Yeremey O.	Ellis Law Group LLP
McMillion, Sandra	Bursor & Fisher, P.A.
North, Blake	
Paff, Chris	
Paff, Terrence	

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT.

SIGNATURE: _____ **DATE:** _____

Defendant's Proposed Jury Questionnaire

Pursuant to the Court's Local Rules and Standing Orders, Defendant Rash Curtis & Associates hereby submits the following proposed voir dire questions.

1. Have you been involved in any lawsuits? Where you the plaintiff or defendant in the lawsuit? Where you satisfied or dissatisfied with the result of the lawsuit(s)?
2. Have you ever served as a juror before. When? What type of case? Was a verdict reached? Was the verdict for plaintiff or defendant? Was the experience good or bad?
3. What is your view point on lawyers? Do you have any experience or problems with lawyers?
4. What is your view point on debt collection agencies? Have you ever worked for a collection agency? Do you have any experience or problems in dealing with a debt collection agency? Is there anything about that experience that would prevent you from being fair to a collection agency defendant in this case?
5. Have you had any friends or family members that have had experiences with collection agencies? Any friends or family members that have been employed by a collection agency? Is there anything about their experience that would prevent you from being fair to a collection agency defendant in this case?
6. What is your view point on credit reporting agencies? Do you have any experience or problems in dealing with a credit reporting agency?
7. Have you recently lost your job? Have you had property foreclosed upon? Have you filed for bankruptcy protection?
8. What is your view point on litigation in general? Do you have any specific issue with a plaintiff in a civil lawsuit? A defendant? Do you have a position with regard to emotional distress damages? Do you have any issue with jury awards in general?
9. What is your position on the burden of proof facing a plaintiff in a civil trial? Do you understand that the plaintiff has the burden of proving their case, there is no burden on the defendant to disprove the plaintiff's case?

- 1 10. Here we are dealing with a corporation on one side and an individual on the other, can
2 you be fair to both sides regardless of plaintiff/defendant, corporation/individual? Is
3 there any reason why you could not be fair to both sides?
4 11. Is there anything I have not asked you that you think is important for one side or the
5 other to know when trying to determine if you would be a fair juror in this case?
6 12. Do you think that you can fairly serve as a juror in this case?
7

8 Dated: March 4, 2019

Respectfully submitted,

9 **BURSOR & FISHER, P.A.**

10 By: /s/ Yeremey Krivoshey
11 Yeremey Krivoshey

12 L. Timothy Fisher (State Bar No. 191626)
13 Yeremey Krivoshey (State Bar No.295032)
14 1990 North California Blvd., Suite 940
15 Walnut Creek, CA 94596
16 Telephone: (925) 300-4455
17 Email: ltfisher@bursor.com
18 ykrivoshey@bursor.com

19 **BURSOR & FISHER, P.A.**

20 Scott A. Bursor (State Bar No. 276006)
21 888 Seventh Avenue
22 New York, NY 10019
23 Telephone: (212) 989-9113
24 Facsimile: (212) 989-9163
25 E-Mail: scott@bursor.com

26 *Attorneys for Plaintiff*

27 Dated: March 4, 2019

28 **ELLIS LAW GROUP LLP**

By: /s/ Mark E. Ellis
Mark E. Ellis

Mark E. Ellis (State Bar No. 127159)
Anthony P.J. Valenti (State Bar No. 288164)
Lawrence K. Iglesias (State Bar No. 303700)
1425 River Park Drive, Suite 400
Sacramento, CA 95815
Tel: (916) 283-8820
Fax: (916) 283-8821
mellis@ellislawgrp.com

1 avalenti@ellislawgrp.com
2 liglesias@ellislawgrp.com

3 *Attorneys for Defendant*
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28